



NEW YORK  
REGIONAL OFFICE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 PEARL STREET, SUITE 20-100  
NEW YORK, NY 10004-2616

June 19, 2024

Application GRANTED. The Clerk of Court is  
directed to terminate ECF No. 65. SO ORDERED.

**VIA ECF**

The Honorable Judge Jesse M. Furman  
United States District Court, Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

June 20, 2024

Re: **SEC v. Mmobuosi, et al., No. 23 Civ. 10928 (JMF)**

Dear Judge Furman:

Plaintiff Securities and Exchange Commission (the “SEC”) respectfully writes regarding the Court’s June 14, 2024 Order requiring the SEC to move for a default judgment in the above-referenced litigation by June 28, 2024. (Dkt. 59) (the “Order”).

The SEC intends to move the Court for a judgment of default, and is currently in the process of drafting the necessary papers in conformity with the applicable rules specified in the Order. Certain monetary components of the relief the SEC anticipates seeking through its motion, however, require authorization from the five-member Commission before SEC staff may request it from the Court. Although the SEC is committed to moving expeditiously in the prosecution of this litigation, the Commission authorization process is unlikely to be complete by the current June 28 deadline. Accordingly, we respectfully request an extension of 28 days (four weeks) for the SEC to file its motion for default judgment, which would extend the deadline from June 28 to July 26, 2024.

This is the SEC’s first request for an extension, and an extension will not affect any other deadlines in this case. As none of the defendants have appeared in the matter, the SEC has not sought consent from any of the other parties.

Respectfully submitted,

/s/ David Zetlin-Jones / Michael S. DiBattista  
David Zetlin-Jones / Michael S. DiBattista  
Counsel to SEC

cc: Robert Horowitz (HorowitzR@gtlaw.com); Kenneth Denos (kdenos@denoslaw.com);  
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